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February 7, 2023

Via NextGen

The Hon. Jennifer L. Rochon
United States District Court
Southern District of New York
500 Pearl Street, Room 1920
New York, New York 10007

Re: Hamad Zaid v. Michael E. Secotte, et al.
Civil Case No.: 1:22-cv-02715

Dear Judge Rochon:

We represent Plaintiff in the above-referenced action. As you know, this is a personal injury action arising out of a motor vehicle accident that occurred on August 12, 2021, when the defendants' tractor trailer and Plaintiff's motor vehicle came into contact. Liability and damages are disputed.

We have conferenced this case with defense counsel and respectfully submit this joint request for a settlement conference. Both sides have commenced with settlement negotiations but feel it would be most productive for resolution if a settlement conference is conducted. Since you will be presiding over the trial of this matter if this case does not settle, we presume the settlement conference should be held before the assigned Magistrate Judge, as outlined in Section 3(H) of your rules, so that all parties can submit confidential settlement submissions in advance of the settlement conference.

The parties are presently in the process of finalizing an agreed upon schedule to complete expert discovery but all parties would like to stay expert discovery until a settlement conference is conducted

so that the parties can conserve resources. In this regard, all parties respectfully request that, if the case does not settle at the settlement conference, that we be permitted to submit another joint letter with an agreed upon schedule to conduct and complete expert discovery. The present deadline to complete expert discovery is March 15, 2023, so we would likely be requesting only a slight extension of that deadline if the case does not settle at a settlement conference.

Respectfully Submitted,




Brett L. Kuller, Esq.

The request is GRANTED. The Court will stay expert discovery to allow the parties to participate in a settlement conference with Judge Gorenstein. The parties shall file a letter requesting a settlement conference with Judge Gorenstein by **February 10, 2023**. If the parties do not reach a settlement at the settlement conference, the parties shall file a new case management plan within 7 days of the settlement conference. The **March 1, 2023** conference is adjourned.

Dated: February 8, 2023
New York, New York

SO ORDERED



JENNIFER L. ROCHON
United States District Judge